

REMARKS

In the Action dated May 3, 2004, the Examiner has rejected claims 1 and 8 under 35 U.S.C. § 103 (a) as being unpatentable over *Tsukagoshi*, US Patent No. 6,058,311 in view of *Alger et al.*, US Patent No. 5,913,217. That rejection is respectfully traversed.

In rejecting claim 1, the Examiner notes a belief that *Tsukagoshi* teaches the substituting of an anonymous identifier for a mobile system's real unique identifier "in order to disguise an identity of the mobile system to an application requesting a unique identifier for the mobile terminal..." citing the abstract. Applicant respectfully urges the Examiner to consider that the Abstract merely states that *Tsukagoshi* teaches the assigning of a temporary identifier to a mobile station in response to a location registration request, a call request and an incoming call request which are transmitted from the mobile station to a network where the mobile station is located. Thereafter, *Tsukagoshi*'s Abstract states expressly "using such a frequently changed temporary identifier, the mobile station is identified by a home memory station." Applicant therefore urges the Examiner to consider that it is beyond cavil that the temporary identifier utilized by the mobile station in *Tsukagoshi* cannot, by any stretch of the imagination, be said to "disguise an identity of the mobile of the mobile station to an application requesting a unique identifier for a mobile terminal" as asserted by the Examiner.

Applicant also urges the Examiner to consider that the unique identifiers described within *Tsukagoshi* are not unique identifiers of a particular mobile station, but rather are unique identifiers which identify a particular subscriber. *Tsukagoshi* teaches the utilization of temporary identifiers to inhibit the ability of eavesdroppers from copying the unique identifier of a particular subscriber by temporarily changing that unique identifier in response to selected conditions. However, each and every time the unique identifier is changed, that unique identifier must be known to those applications wishing to identify the subscriber, or else the subscriber's telephone charges could not be appropriately billed to that particular subscriber.

Thus, in summary, *Tsukagoshi* teaches the utilization of temporary identifiers to inhibit the ability of eavesdroppers to identify a particular identifier associated with a selected user; however, the temporary identifiers utilized by the subscriber in the *Tsukagoshi* system are always known to the network and those temporary identifiers always identify a particular subscriber.

Claim 1 of the present application, for example, expressly states that anonymous UUID "does not identify any particular computer system..." and this is clearly contrary to the teaching of *Tsukagoshi* where a particular subscriber must be identified at all times in order to utilize the mobile communication system.

The Examiner combines *Tsukagoshi* with *Alger et al.* in view of the absolute failure of *Tsukagoshi* to suggest in anyway the utilization of a unique identifier which is a Universal Unique Identifier (UUID) but notes that *Alger et al.* only teach the generation and compression of a UUID. Consequently, the Examiner believes that a combination of *Alger et al.* with *Tsukagoshi* would suggest to the ordinarily skilled practitioner in the art the substitution of an anonymous UUID to disguise a particular computer system on a network. As noted above, Applicant urges the Examiner to consider *Tsukagoshi*, in order to operate properly, utilizes temporary IDs which are, at all times, known to the system, so that charges for the phone calls made by a particular subscriber identified by those temporary identities can be levied appropriately.

Further, Applicant urges that *Tsukagoshi* teaches temporary IDs which identify a particular subscriber and that the UUID of *Alger et al.* identifies a particular computer system. Consequently, no possible combination of these two references could result in the claimed invention set forth within claims 1 and 8 and withdrawal of the Examiner's rejection is respectfully requested.

Examiner has rejected claims 2-7 and 9-14 under U.S.C. § 103 (a) as being unpatentable over *Tsukagoshi* in view of *Alger et al.* and further in view of *Gabber et al.* US Patent No. 5,961,593. That rejection is also respectfully traversed.

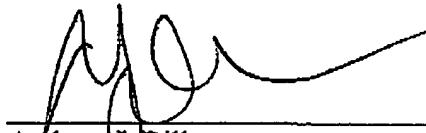
As set forth above, *Tsukagoshi* and *Alger et al.* fail to show or suggest the invention set forth within the claims of the present application in which an anonymous UUID is generated which does not identify a particular computer system. This is true because *Tsukagoshi* must at all times identify a particular subscriber in order for that subscriber to have access to the mobile telephone system and no anonymous identification could be permitted. The Examiner cites *Gabber et al.* for its teaching of method of providing anonymous identifiers to the server side to prevent a server from determining the true identity of users; however, *Gabber et al.* teach the

interposition of a proxy device between the user and the server in order to protect the identity of the user and fail to show or suggest in any way the disguising of the real identity of a computer system by providing an anonymous UUID which is not associated with any particular computer system, as set forth expressly within the claims.

Further, claims 6 and 13 expressly recite the establishment of a cloak bit which the Examiner believes is suggested by the teaching of *Gabber et al.*; however, Applicant has carefully examined *Gabber et al.* and fails to find the slightest suggestion therein for a "cloak bit" as that term is defined in the present specification and set forth within the claims. Consequently, Applicant urges that claims 6 and 13, as well as claims 7 and 14, recite features such as the "cloak bit" for which there is not the slightest suggestion within the cited references and withdrawal of the Examiner's rejection of these claims is respectfully requested.

No extension of time is believed to be required. However, in the event that an extension of time is required, please charge that extension fee and any other required fees to IBM Corporation Deposit Account Number 50-0563.

Respectfully submitted,



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